

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE NATIONAL ACADEMY OF TELEVISION  
ARTS AND SCIENCES, INC. and ACADEMY OF  
TELEVISION ARTS & SCIENCES,

*Plaintiffs,*

v.

MULTIMEDIA SYSTEM DESIGN, INC. d/b/a  
“CROWDSOURCE THE TRUTH”,

*Defendant.*

**20-cv-07269 (VEC)**

**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT,  
PERMANENT INJUNCTION,  
AND ATTORNEYS’ FEES AND  
COSTS**

**NOTICE IS HEREBY GIVEN** that pursuant to the Court’s January 3, 2022 Order (Dkt. 140) and in accordance with the Individual Practices in Civil Cases of Valerie Caproni, United States District Judge, the Court’s Individual Local Civil Rule 55.2(b), and Federal Rule of Civil Procedure 55(b)(2), The National Academy of Television Arts and Sciences, Inc. and Academy of Television Arts & Sciences (collectively, the “Academies” or “Plaintiffs”), by and through their undersigned counsel, move for default judgment and a permanent injunction against Defendant Multimedia System Design, Inc. d/b/a “Crowdsource the Truth,” its respective officers, agents, servants, employees, successors and assigns, and all persons acting in concert with or under the direction of Defendant and for an award of attorneys’ fees and costs (“Motion for Default Judgment”).

Plaintiffs’ Motion for Default Judgment is supported by the Affidavit of Margaret A. Esquenet and attached exhibits, Plaintiffs’ Memorandum of Law, and upon all prior pleadings and proceedings herein.

Dated: January 10, 2022

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW  
GARRETT & DUNNER LLP

/s/ Margaret A. Esquenet  
Margaret Esquenet, Esq. (*pro hac vice*)  
B. Brett Heavner, Esq. (*pro hac vice*)  
Mary Kate Brennan, Esq.  
901 New York Avenue NW  
Washington, DC 20001  
Telephone: (202) 408-4000  
Facsimile: (202) 408-4400  
margaret.esquenet@finnegan.com  
b.brett.heavner@finnegan.com  
marykate.brennan@finnegan.com

*Attorneys for Plaintiffs*